

February 26, 2010 Via ECFS

Ms. Marlene H. Dortch, FCC Secretary Office of the Secretary Federal Communications Commission 445 12th Street, SW, Suite TW-A325 Washington, DC 20554

RE:

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2009

Computer Tel, Inc. Filer ID: 825823

Dear Ms. Dortch:

Enclosed for filing is the 2009 CPNI Compliance Certification submitted on behalf of Computer Tel, Inc., Inc. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with the Public Notice DA 10-91 issued January 15, 2010.

Any questions you may have concerning this filing may be directed to me at 470-740-3005 or via email to mbyrnes@tminc.com.

Sincerely,

Monique Byrnes

Consultant to Computer Tel, Inc.

Attachments

Best Copy and Printing (via email to FCC@BCPIWEB.COM) cc:

A. Gutierrez, Computer Tel

file: Computer Tel – FCC CPNI

FCCx2010-1 tms:

### ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

#### EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for:

2009

Date Filed:

February 26, 2010

Name of Company covered by this certification:

Computer Tel, Inc.

Form 499 Filer ID:

825823

Name of Signatory:

Felipe Guelfi

Title of Signatory:

Chief Financial Officer

I, Felipe Guelfi, certify and state that:

- 1. I am Chief Financial Officer of Computer Tel, Inc., and, acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules See 47 C.F.R. § 64.2001 et seq.
- 2. Attached to this certification, as Exhibit A, is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64,2001 et seq. of the Commission's rules.
- 3. The company has not taken any actions (i.e., proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
- 4. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
- 5. The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Felipe Guelfi, Chief Financial Officer Computer Tel, Inc.

FER

Nata

2010

Date

Attachments:

Accompanying Statement explaining CPNI procedures – Attachment A

Explanation of actions taken against data brokers - not applicable

Summary of customer complaints - not applicable

Attachment A
Statement of CPNI Procedures and Compliance

Computer Tel, Inc.

Calendar Year 2009

# ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

#### **EB DOCKET 06-36**

Computer Tel, Inc.

Statement of CPNI Procedures and Compliance

Computer Tel, Inc. ("Computer Tel" or "Company") provides wholesale international terminating telecommunications services to other carriers and as such does not have any subscribed service relationship with end user business or residential customers. The Company does not obtain, retain or use CPNI for any purpose. Although the Company has call detail records, it does not have any information regarding the calling or called party, and such information is not used for marketing purposes. The Company is committed to protecting the confidentiality of all customer information, including CPNI and call detail records. Company employees are prohibited from disclosing such information and each Company has procedures which provide for disciplinary action for such violations, up to and including termination of employment.

Moreover, the Company does not market their services to end users in any fashion. Instead, marketing efforts are directed towards resellers and other carriers who require international termination. Marketing efforts do not include the use of CPNI or call detail records.

The Company does not disclose call record information over the telephone.

The Company does not disclose detail records on-line.

The Company does not have any retail locations and therefore does not disclose call detail records in-store.

Should the Company expand its business in the future to include the provision of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI, including call detail records, is used or disclosed.

Requests for call detail records by law enforcement agencies are only granted under subpoena.

### Computer Tel, Inc.

## Statement of CPNI Procedures and Compliance (Page 2)

The Company has procedures to notify law enforcement in the event of a breach of customers' CPNI, including call detail records, to ensure that notification is provided in the time period set forth in the FCC's rules, or if applicable, when so authorized by law enforcement. In addition, each Company has a process to record all breaches discovered and will provide notification to the United States Secret Service, FBI and customers, to the extent possible.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI, including call detail records, in calendar year 2009.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call detail records.